



April 9, 2021

Dan Mallett
New-Indy Catawba, LLC
PO Box 7
Catawba, SC 29704

Re: York and Lancaster Odor Investigation

Dear Mr. Mallett:

As you are aware, the South Carolina Department of Health and Environmental Control (DHEC) has been actively investigating the source(s) of strong odors in Lancaster and York counties. Between the period of March 12, 2021 and 10:00 a.m. April 9, 2021, DHEC has received over 5000 reports from citizens in York and Lancaster counties in South Carolina and North Carolina describing odors of rotten eggs, sewage/sewer gas, cabbage, paper mill smells, chemicals, etc.

Our strategy for investigating the widespread reports of odors:

- Evaluate regulated facilities whose operations could be a source of odor consistent with reports from citizens to determine current compliance with permit and regulatory requirements.
- Evaluate any changes in facility operations, which could be contributing to odors.
- Engage with the community and include them in the investigation via a citizen portal to aid the Department's response and investigation.
- Assess information submitted via the citizen portal including location, time and day, wind direction, etc. and perform back trajectory/air modeling analyses.

We have conducted recent air quality, wastewater, and landfill inspections at the New-Indy Catawba LLC facility to determine compliance with the respective permits. Attached please find copies of these inspection reports. These reports have been forwarded to the appropriate compliance sections for further review. Compliance was assessed at the date and time of the inspection. Note that your facility's overall compliance status may be different from that indicated in an individual report.

Investigation

DHEC staff have experienced offsite odors that are characteristic of those at a pulp and paper facility. These odors have been observed on Highway 5 as it crosses the Catawba River near the facility, in neighborhoods several miles away, in Rock Hill, Lancaster, and Indian Land. In addition, the Department has received complaints of airborne "foam," "ash," and "filaments." DHEC staff have observed airborne "foam" while on the facility property and on Highway 5 crossing the Catawba River. After a September 1, 2020, citizen complaint regarding foam, the facility indicated that the foam was due to an increase in

organics in the wastewater treatment plant. The facility stated that they had added “defoamer” to the WWTP the day before and sprinklers were being brought in to help keep the foam down.

DHEC established a Community Odor Log Surveillance Group on March 19, 2021. This small group of community members were asked to volunteer to keep a daily odor log and were instructed to contact DHEC at any time when significant odor issues were detected. This information has been used to inform our surveillance activities and validate odors that were traced back to New-Indy Catawba LLC, located at 5300 Cureton Ferry Road, Catawba, SC 29704.

The Department also conducted Back Trajectories to help ascertain the origin and source of the odor complaints. These analyses indicate that air emissions from New Indy Catawba LLC likely contributed to the upstream sourcing for most of the complaints assessed. Attached please find a copy of the Back Trajectory Analysis Summary.

Based on the results of our investigation, it appears that New-Indy Catawba LLC located at 5300 Cureton Ferry Road, Catawba, SC 29704 is a significant contributor to the reported odors in the York and Lancaster area. At this time, we have not identified any other significant sources of the reported odors. While regulatory compliance determinations based on the inspections are still pending, we respectfully request that New-Indy Catawba LLC fully evaluate its operations and identify and take corrective actions on any potential sources that could be contributing to the odors currently being investigated in York and Lancaster counties.

The wastewater treatment plant processes should be evaluated to determine if operation and maintenance of the system is appropriate based on the current operations. The attached wastewater inspection report identifies several deficiencies that should be addressed immediately. The facility’s manuals and plans should be updated to reflect current operations and updated documents submitted by April 20, 2021. This includes the odor abatement plan.

On March 26, 2021, we requested information related to current sludge management operations at the facility. You submitted October 2014 and March 2017 documents in response to this request. Please provide recent information that addresses current sludge management including but not limited to how you are facilitating the proper operations of the wastewater system and a description of how you are moving the legacy sludge to lagoon 4 and meeting the obligations under the Voluntary Cleanup Contract.

The recent modifications related to the shut down of the air stripper and the hard piping of the foul condensate tank to the WWTP at the facility should be evaluated to determine if they are contributing to the odors in the community. This evaluation should include but not be limited to the following:

- What source(s) is the foul condensate tank collecting?
 - What are the estimated increased air emissions of total reduced sulfur (TRS), including hydrogen sulfide (H₂S), from that activity into the wastewater treatment basin?
 - Can you test TRS, including H₂S, emissions from sources going into the foul condensate tank? If no, why not?
- It appears that the facility expects the total volume of wastewater to be treated and the methanol in the foul condensate to both be reduced by 50%.
 - Is the facility experiencing that expected reduction at the WWTP at this time?

- How are the TRS emissions treated at the WWTP?
- Can the TRS emissions be tested at the WWTP?

Additionally, the recent change in operation from making bleached paper to brown paper appears to have increased the overall TRS and H₂S emissions from the facility. Any increases in stack emissions, changes in operation of pollution control equipment, and any uncontrolled emissions should be evaluated to determine if these changes are contributing to the odors in the community. This evaluation should include, but not be limited to the following:

- The TRS air emissions from the paper machines appear to have increased.
 - How and where are these emissions vented/released to the atmosphere? Are there any fugitive sources at the paper machines?
 - Can the TRS emissions be tested at these sources?
- Identify and quantify any other sources of emission increases.
- Conduct air dispersion modeling to characterize the impact from this project as compared to pre-modification.
- What percentage of overall emissions are now fugitive or uncontrolled versus being emitted via a stack and controlled?

Please evaluate the content of this letter and respond to the questions and concerns that are posed in writing by April 20, 2021. Should your operational evaluation reveal any potential sources of odors, please provide a plan for corrective measures that can be undertaken to minimize the odors and include an expeditious timeline for implementation. We also recommend that you establish a citizen advisory board to engage the community in New-Indy Catawba LLC projects or issues and develop a citizen portal to receive odor concerns directly from the community.

Sincerely,



Renee G. Shealy, Chief
Bureau of Environmental Health Services

cc: Myra C. Reece, Director of Environmental Affairs
Rhonda Banks Thompson, P.E., Chief, Bureau of Air Quality
Henry J. Porter, Chief, Bureau of Land and Waste Management
Mike Marcus, Ph.D., Chief, Bureau of Water